

**-FILED-**

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF INDIANA**

**MAR 13 2017**

[This form is for non-prisoners to file a civil complaint. NEATLY print in ink (or type) your name and address in the margins.]

Robert Lee Jones Jr  
[You are the PLAINTIFF, print your full name on this line.]

v. M/A Mgmt. Corp.

Runaway Bay Apartments  
[The DEFENDANT is who you are suing. Put ONE name on this line. List ALL defendants below, including this one.]

Case Number 3:17CV210  
[For a new case in this court, leave blank.  
The court will assign a case number.]

[The top of this page is the caption. Everything you file in this case must have the same caption. Once you know your case number, it is VERY IMPORTANT that you include it on everything you send to the court for this case. DO NOT send more than one copy of anything to the court.]

**CIVIL COMPLAINT**

#	Defendant's Name and Job Title	Address
1	[Put the defendant named in the caption in this box.] <u>M/A Mgmt Corp</u> <u>Runaway Bay Apartments</u>	<u>302 Runaway Bay Circle</u> <u>Mishawaka, IN. 46545</u>
2	[Put the names of any other defendants in these boxes.]	
3		

[If you are suing more defendants, attach an additional page. Number each defendant. Put the name, job title, and address of each defendant in a separate box as shown here.]

- How many defendants are you suing? 1
- What is your address? 1606 Enchanted Forest St  
So. Bend, IN. 46637
- What is your telephone number: (574) 300-4339
- Have you ever sued anyone for these exact same claims?  
☒ No.  
☐ Yes, attached is a copy of the final judgment OR an additional sheet listing the court, case number, file date, judgment date, and result of the previous case(s).

[DO NOT write in the margins or on the back of any pages. Attach additional pages if necessary.]

CLAIMS and FACTS

DO: Write a short and plain statement telling what each defendant did wrong.

DO: Use simple English words and sentences.

**DO NOT:** Quote from cases or statutes, use legal terms, or make legal arguments.

DO: Explain when, where, why, and how these events happened.

DO: Include every fact necessary to explain your case and describe your injuries or damages.

DO: Number any documents you attach and refer to them by number in your complaint.

**DO NOT:** Include the names of minors, social security numbers, or dates of birth.

DO: Use each defendant's name every time you refer to that defendant.

DO: Number your paragraphs. *[The first paragraph has been numbered for you.]*

1. On 12/20/16 the defendant entered into our apartment to perform maintenance request for our refrigerator and gas furnace. Once I noticed how heavily soiled the defendant's gloves were. I kindly asked if he could wash his hands. At this point he had already entered the refrigerator. That's when the second individual at the furnace yelled he don't have to wash his hands. I then turned and excuse me, but I'm not even talking to you in a gentle voice. I then turned back to the maintenance man at the refrigerator and asked again kindly, but this time giving an explanation as to why. "My children have food in there and I don't want all those germs in their food. I used gloves even though I suspected them to be poisons. The maintenance man at the furnace then said again yelling. I said, he don't have to wash his hands. I'm his boss and this is our property. I then said sir, this is my home. The maintenance

## Claims and Facts (continued)

man at the refrigerator took off his gloves and slammed them to the counter. Considering the debris his gloves left everywhere. I then asked if he would please remove them from the counter. Maintenance man at the furnace was still yelling demands and maintenance man

PRIOR LAWSUITS – Have you ever sued anyone for this exact same event?

☒ No.

☐ Yes, attached is a copy of the final judgment OR an additional sheet listing the court, case number, file date, judgment date, and result of the previous case(s).

RELIEF – If you win this case, what do you want the court to order the defendant to do?

Pay me in the amount of \$250,000

Jury Trial requested  
Electronics to present evidence Laptop plug in capabilities

FILING FEE – Are you paying the filing fee?

☒ Yes, I am paying the \$400.00 filing fee. I understand that I am responsible to notify the defendant about this case as required by Federal Rule of Civil Procedure 4. [If you want the clerk to sign and seal a summons, you need to prepare the summons and submit it to the clerk.]

☐ No, I am filing a Motion to Proceed In Forma Pauperis and asking the court to notify the defendant about this case.

[Initial Each Statement]

RS I will keep a copy of this complaint for my records.

RS I will promptly notify the court of any change of address.

RS I declare under penalty of perjury that the statements in this complaint are true.

MR Robert Z. Jones Jr.  
Signature

3/17  
Date

3 At the refrigerator yelled I'm out of here, grabbed his gloves and took off the counter and came storming at me. I was standing at the entrance of the kitchen the whole time during this confrontation. As he stormed towards me, he ran into me, chest butting and causing me to stumble backwards into our dining room table. I then asked him, So you just going to barge right through me? While he stood in my personal space, I moved to my left so he could get through, but he moved to his right.

4 I then completely left the small opening so he could leave. Then maintenance man at the furnace asked me if I wanted the professionals to come out and I said yes. As he left I followed behind him and shut the door. Afterwards I called the police to report the maintenance chest but or push as an assault. After that, I made an attempt to call Runaway Bay Management to report their misconduct and the defendant refused to speak with me.

5 When asked why she said because a police report was made and I would have to call corporate. When I asked for their number she said she didn't have it, I told her ~~several~~ several times that they lied.

6 On 12/27/16 when confronting the defendant about a letter demanding me to vacate our home the defendant discriminated against me and retaliated against me for telling my side of the story. The defendant also threatened me. she said she was calling the police on me.

7 On 12/28/16 The defendant harassed me by refusing to take my rental payment. This was harassment because their letter clearly stated that I still had to pay my rent to them, but they insisted several times they weren't taking my rent and it wasn't my responsibility. Eventually they accepted my rental payment.

repairs and was told that I could have it, but later denied. When asked about having repairs done Management demanded that I not be home in exchange for urgently needed repairs. This is a direct violation of my civil rights. The defendant was untruthful about appliance diagnostic and unfairly suggested that considering how loud it was would be better in a basement.

9 The defendant asked me if I wanted repairs and I said yes on all I requested, but the defendant insisted that I couldn't be in my own home.

10 On 12/29/16 the defendant called the police on me for enjoying the clubhouse. The defendant misinformed the police telling them my lease had been terminated, evicted and I was trespassing. This turned into me being harassed by the police when I done nothing illegal.



11 On 11/2/17 while watching football in the clubhouse  
a police approached me tapping me on my shoulder.  
I answered yes sir, how may I help you? He  
said lets go. I said excuse me? He said lets  
go. You need to leave this clubhouse now or  
I'm going to arrest you. I asked for  
what? And he said for trespassing. You've  
been evicted and they're having removed for  
trespassing or you will be arrested. So I  
stopped watching the game and left. This  
was very intimidating considering how I was  
just trying to enjoy a game. This is another  
cruel act of discrimination, harassment and  
deliberate infliction of emotional harm.  
12 As I left they had the police shove me in  
the back out the doors. This was their  
illegal eviction initiated by denying me equal  
access to a community center for all  
residents. According to the letter they had  
sent me concerning my lease being terminated  
wouldn't go into effect until January 6<sup>th</sup> 2017  
They started enforcing higher standards on me  
that were stressful, degrading and unbearable.

13 They denied my family residential privileges that we paid for and was included for being residents. Almost everytime I showed up at the clubhouse they would call the police, or threaten to. They eventually hired security to further discourage my family from enjoying our stay. He would meet me at the door asking questions, offering to do the managers job of receiving information etc. In fear of being arrested, I didnt use the gym or clubhouse anymore after the police threatened to arrest me. Before I received the letter concerning the termination of my lease, I special ordered alot of items to be delivered at the clubhouse, so I still had to make several uncomfortable trips to the clubhouse to pick up packages. I decided to wait at the door to avoid being arrested.

14 Around 12/29/16 I started experiencing extreme headaches that my doctor and I agreed that it was from the furnace noise levels and possibilities of carbon monoxide poisoning.



15 Since December I've been taking medication for the anxiety produced from these harmful experiences. My doctor also designed a treatment plan for the constant headaches.

16 Around the first week of January I started having stomach pain. I suspected being poisoned. I seen my doctor and he did tell me when asked that it could be connected to my stress.

17 ~~On~~ On the week of 1/9/17 the defendant replaced at least 2 refrigerators for other residents. They may have even replaced 1 furnace for another resident. But for discriminatory reasons wouldn't replace ours. Two things that constantly stressed me are that if my family didn't have an urgent need for repairs, we would still be living where we wanted to be. secondly, If the maintenance men wouldn't have lied on me.

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18 One thing I failed to mention earlier was  
on 12/20/16 the maintenance men reported  
false accounts of what happened in my  
apartment in attempts to have me  
criminally prosecuted for a crime I  
didn't commit. The Defendant agreed not to  
discriminate to any of their residents but discriminated  
19 I have <sup>against us,</sup> been seeing a therapist to help  
me process my feeling and maintain a  
rational mind state.

20 I'm asking an award for actual  
damages, punitive damages, consequential  
damages and any other monetary awards  
the court finds appropriate.

Thank you.

Also the stress was and has been so intense that it did and still does leaves me so weak that I can't work.

I had too many restless nights because of stress, headaches and stomach pains. These all started at Runaway Bay and some still persists at different degrees. What they did has destroyed my personal and professional life. It has even put my child at a disadvantage. This has also hurt me financially. This could put me out of business, I constantly feel paranoid and stalked by them.